

Hearing Date: July 15, 2009 at 10:00 a.m.
Objection Deadline: July 10, 2009 at 4:00 p.m.

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	:	Chapter 11
	:	
In re:	:	Case Nos. 08-13555(JMP)
	:	
LEHMAN BROTHERS HOLDINGS	:	(Jointly Administered)
INC., et. al.,	:	
	:	
Debtor.	:	
	:	

**NOTICE OF MOTION OF OCCIDENTAL POWER SERVICES, INC. AND
OCCIDENTAL ENERGY MARKETING, INC. TO EFFECTUATE SETOFF AND
SETTLE OUTSTANDING DERIVATIVE CONTRACTS AND FOR RELATED RELIEF**

PLEASE TAKE NOTICE that a hearing (the “Hearing”) shall be heard before the Honorable James M. Peek, United States Bankruptcy Judge, at the United States Bankruptcy Court, Alexander Hamilton Customs House, Courtroom 601, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”), on **July 15, 2009 at 10:00 a.m.** (Prevailing Eastern Time), or as soon thereafter as counsel may be heard to consider the Motion of Occidental Power Services, Inc. (“OPSI”) and Occidental Energy Marketing, Inc. (“OEMI” and jointly with OPSI, “Occidental”) to Effectuate Setoff and Settle Outstanding Derivative Contracts and for Related Relief (the “Motion”) filed by Occidental.

PLEASE TAKE FURTHER NOTICE that the Motion was filed electronically with the Bankruptcy Court on June 29, 2009 and was served on all parties who have requested notice in the above referenced chapter 11 cases on the same day. The Motion may also be examined and inspected by interested parties on (i) the Court's website (<http://www.nysb.uscourts.gov>) or (ii) Epiq's website (<http://chapter11.epiqsystems.com>).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the Southern District of New York, shall set forth the name of the objecting party, the basis for the objection and the specific grounds thereof, shall be filed the Bankruptcy Court electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's case filing system and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Microsoft Word, or any other Windows-based word processing format (with two hard copies delivered directly to Chambers), and shall be served upon: (i) the chambers of the Honorable James M. Peek, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) Weil Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, (Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq.), attorneys for the Debtors; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York, 10004 (attn: Andy Velez-Rivera, Paul Schwartzberg, Brian Masumoto, Linda Riffkin and Tracy Hope Davis); (iv) Milbank Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005, (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq.) attorneys for the official committee of unsecured creditors; and (v) McCarter & English LLP, 245 Park Avenue, 27th Floor, New York, New York

10167 (attn: David J. Adler,); and (iii) so as to be received no later than **July, 10, 2009 at 4:00 p.m.** (Prevailing Eastern Time) (the “Objection Deadline).

PLEASE TAKE FURTHER NOTICE that if an objection to the Motion is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned from time to time without notice to any creditor or other party in interest other than by announcement of the adjourned date in open court on the date of the hearing.

/s/ David J. Adler

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Dated: June 29, 2009
New York, NY